

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION DOCKETED

2002 JUN 14 P 4:02

WILLIAMS A. MUNDELL

Chairman

JUN 14 2002

JIM IRVIN

Commissioner

AZ CORP COMMISSION
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MARC SPITZER

Commissioner

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IN THE MATTER OF THE GENERIC
PROCEEDINGS CONCERNING ELECTRIC
RESTRUCTURING ISSUES.

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY'S REQUEST FOR
VARIANCE OF CERTAIN
REQUIREMENTS OF A.A.C. R14-2-1606.

Docket No. E-01345A-01-0822

IN THE MATTER OF THE GENERIC
PROCEEDING CONCERNING THE
ARIZONA INDEPENDENT SCHEDULING
ADMINISTRATOR.

Docket No. E-00000A-01-0630

IN THE MATTER OF TUCSON ELECTRIC
POWER COMPANY'S APPLICATION FOR
A VARIANCE OF CERTAIN ELECTRIC
COMPETITION RULES COMPLIANCE
DATES.

Docket No. E-01933A-02-0069

IN THE MATTER OF THE APPLICATION
OF TUCSON ELECTRIC POWER
COMPANY FOR APPROVAL OF ITS
STRANDED COST RECOVERY.

Docket No. E-01933A-98-0471

MOTION TO INTERVENE

AES New Energy, Inc. ("AES NE"), pursuant to A.A.C. R14-3-105,
hereby moves to intervene in the above-captioned proceeding. In support hereof, AES
NE states as follows:

1. AES NE holds a certificate of convenience and necessity to
provide competitive services as an electric services provider. AES NE is a wholly-
owned subsidiary of the AES Corporation, a leading global power company comprised
of competitive generation, distribution and retail businesses around the world.

JONES, SKELTON & HOCHULL, P.L.C.

ATTORNEYS AT LAW
2901 NORTH CENTRAL AVENUE
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TELEPHONE (602) 263-1700

1 2. AES NE seeks to participate in these proceedings because the
2 issues being resolved here will affect whether electric competition is viable in Arizona.
3 These proceedings therefore directly affect AES NE's financial interest in providing
4 competitive electric services.

5 3. AES NE's participation in this proceeding will not unduly
6 broaden the nature or scope of this proceeding.

7 4. No other party or intervenor can represent the interests of AES
8 NE.

9 5. Service of all correspondence, documents or pleadings should
10 be made to counsel for AES NE as follows:

11 Daniel W. Douglass
12 Law Offices of Daniel W. Douglass
13 5959 Topanga Canyon Blvd., Suite 244
 Woodland Hills, CA 91367-7313

14 and

15 Randall H. Warner
16 Jones Skelton & Hochuli, PLC
 2901 N. Central Avenue, Suite 800
 Phoenix, Arizona 85012

17 6. AES NE only determined that intervention was necessary when
18 it reviewed the testimony of Tucson Electric Power Company's witnesses. Because it
19 believes the position advocated by TEP's witnesses would be detrimental to
20 competition, it has file rebuttal testimony and requests leave to intervene.

21 WHEREFORE, for the foregoing reasons, AES NE respectfully requests
22 that the Commission issue its order granting this Motion to Intervene.
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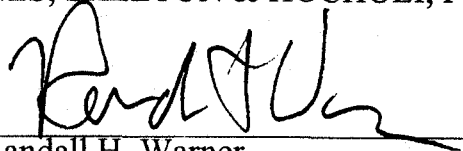
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RESPECTFULLY SUBMITTED this 17th day of June, 2002.

JONES, SKELTON & HOCHULI, P.L.C.

By



Randall H. Warner
2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012

and

Daniel W. Douglass
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Attorneys for AES New Energy, Inc.

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1 ORIGINAL and 10 COPIES filed
2 this 14th day of June, 2002, with:

3 Docket Control
4 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

5 COPY of the foregoing delivered
6 this 14th day of June, 2002, to:

7 Lyn Farmer
8 Chief Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

9 Christopher Kempley
10 Chief Counsel
Arizona Corporation Commission
11 1200 W. Washington Street
Phoenix, AZ 85007

12 Ernest G. Johnson
13 Utilities Division
Arizona Corporation Commission
14 1200 W. Washington Street
Phoenix, AZ 85007

15 COPY of the foregoing mailed
16 this 14th day of June, 2002, to:

17 All parties in ACC Docket
18 No. E-0000A-02-0051

19 M. Hawley
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